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December 23, 2021

VIA ECF

The Honorable Anne E. Thompson, U.S.D.J.
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: DePaco v. SIC Noticias, et al
Civil Action No.: 3:21-cv-14402-AET-TJB

Dear Judge Thompson:

We represent Defendants SIC Noticias, Sociedade Independente de Comunicacao ("SIC"), Impresa Sociedade Gestora de Participacoes Sociais, SA ("Impresa"), Pedro Coelho ("Coelho"), Ricardo Costa ("Costa"), and Marta Reis ("Reis") in the this matter. We write to respectfully request a 45 day extension up until February 7, 2022 for our clients to answer, move or otherwise respond to the complaint. Our clients are located in Portugal and we require additional time to review the allegations and plan a proper defense. Plaintiff's counsel has consented to this request. Additionally, we have consented to accept service for SIC. This is our first request for an extension.

If you have any questions, please contact us.

Respectfully submitted,

/s/ Joseph N. Froehlich
Joseph N. Froehlich

JNF:md

SO ORDEDED:

s/ Tonianne J. Bongiovanni
Hon. Tonianne J. Bongiovanni, U.S.M.J.
Dated: December 27, 2021